

# Word of Life Ministries

P. O. Box 8482 Monroe, LA 71211 (318)322-5700

July 31, 2015  
*via electronic filing*

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

Re: Word of Life Response to the Opposition Filed by Georgetown Law  
(CGB-CC-1350)

Dear Ms. Dortch:

Georgetown Law opposition to the economically burdensome waiver request filed by Word of Life is not factually based and should be rejected for the following reasons:

Georgetown Law suggest that the application should be rejected because the initial application did not fully comply with the requirements set forth by the FCC. It should be noted that a good faith effort was made to supplement Word of Life's initial request. Also, after the petition was filed it was determined that the request for additional information was sent to the wrong address and was not received by the petitioner. The petitioner contacted the FCC and was advised that it may be better to file another hardship request online. That suggestion was followed giving rise to the present application. It would be unjust to penalize a non-profit organization serving the needs of the local community because of technical issues associated with the process that is technical in nature when it is clear that Word of Life was making a good faith effort to do so.

Secondly, Georgetown Law argues that providing a closed-captioned program would not be economically burdensome to cover the cost. The quote from CaptionMax would cost \$235.00 per episode, and the second quote from VITAC would cost \$387.50 per episode weekly.

Contrary to statements by Georgetown, Word of Life has not carried over significant revenue for 2012 and 2013. We did not have cash access of \$67,642 and \$67,410 in 2012 and 2013 as Georgetown Law has implied. Those amounts were simply net assets, and this is not liquid cash. This is simply property, furniture, equipment and other items. The carry-forward for those years were not cash as represented by Georgetown. Please refer to our financial report on file with the FCC that show the cash balances for the respective years. The ending balances for 2013 and 2012 were \$6,485 and \$4,049 respectively. Those cash-on-hand funds were

spent for rent and utility costs at the beginning of the year. It is simply not right for Georgetown Law to reference general assets balances of those amounts to support justification of closed-captioning.

Georgetown Law suggest that this would not be economically burdensome because Word of Life financial report shows that it has sufficient assets to cover the cost of captioning. This allegation is factually incorrect and a misrepresentation of the financial information provided in its application.

Further it should be noted that Word of Life serves the economically depressed area of the country which is Northeast Louisiana that forms a part of the Mississippi Delta. This impoverished area has limited resources to give to charitable endeavors. Georgetown Law suggests that Word of Life has failed to demonstrate that it could raise the funds from this population which is also not factually based. Georgetown Law states that economically burdensome standard requires that petitioners attempt to receive financial assistance from their distributors before seeking a waiver. Word of Life has at times requested that the viewing audience send in donations to support the program, but again the viewing audience does consist of poor, sick and shut-in in this depressed area of the state.

Word of Life is precisely the kind of program that the economically burdensome provision should apply to. It has limited assets and resources. It serves the needed function for the community that it serves. It is not a profit-driven entity, but it is one that provides a needed service to the community.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edna G. Smith".

Edna G. Smith

#### References

-----  
Financial statements submitted to FCC

CERTIFICATE OF SERVICE

I, Edna G. Smith, Secretary for Word of Life, do hereby certify that, on July 31, 2015, pursuant to the Commission's aforementioned Public Notice, a copy of the foregoing document was served by first class U.S. mail, postage prepaid, upon the Petitioner at the address listed below.

Georgetown Law

Institute for Public Representation

600 New Jersey Ave., NW, Ste. 312

Washington, DC 20001-2075

A handwritten signature in cursive script, reading "Edna G. Smith", is written over a horizontal line.

Edna G. Smith

Word of Life

July 31, 2015


AFFIDAVIT

BEFORE ME, in and for the Parish of Ouachita, personally came and appeared Edna G. Smith, Secretary for WORD OF LIFE FULL GOSPEL BAPTIST CHURCH after being sworn, affirmed that the information contained in the petition is true and accurate to the best of her knowledge.

THUS DONE AND SIGNED, on July 31, 2015.

A handwritten signature in cursive script, appearing to read "Edna G. Smith", written over a horizontal line.

Edna G. Smith

A handwritten signature in cursive script, appearing to read "J. Garland Smith", written over a horizontal line.

NOTARY PUBLIC

J. Garland Smith

Bar Roll #12193